

February 3, 2006

MARLENE H DORTCH  
OFFICE OF THE SECRETARY  
FEDERAL COMMUNICATIONS COMMISSION  
445 12<sup>TH</sup> ST SW  
WASHINGTON DC 20554

BUCKET FILE COPY GROUP 11

Re: CPNI Compliance Certificate; Telecom Management, Inc. dba Pioneer Telephone  
FCC Registration No. 0005-8591-11  
Docket Nos. EB-06-TC-060 and EB-06-36

Dear Ms. Dortch:

I have enclosed a certificate to comply with the requirements of 47 CFR §64.2009(e). In addition, this letter shall serve as the “accompanying statement” explaining how Pioneer’s operating procedures ensure compliance with the FCC’s rules relating to CPNI.

Pioneer is a reseller of landline, long distance-only services and regards CPNI as information needing the greatest possible protection. Our customers' private data such as phone numbers called, length of phone calls, services purchased, and personal/credit card information is protected from dissemination to the public in a number of ways. Pioneer participates in VISA/Mastercard's compliance certification program that scans our network for vulnerabilities and ensures Pioneer meets their security standards. To keep hackers from accessing our network, Pioneer utilizes a perimeter based SonicWALL TZ 170 Unrestricted Node device with ICSA Firewall 4.1, ICSA IPSec VPN 1.0d, and FIPS 140-2 industry certifications. In addition, real-time gateway anti-virus, anti-spyware, and intrusion prevention software is utilized to protect Pioneer from an array of network-based and sophisticated application layer threats. Only explicit application-dependent communication ports are authorized for usage as part of our transportation layer security.

On the employee side, each employee of Pioneer is trained to understand the importance of keeping CPNI confidential and made to sign a formal confidentiality agreement. The agreement further imports the weight of this duty on the employee and provides Pioneer with a mechanism to legally enforce this operating procedure should it be breached. Finally, access to customer records is restricted only to those individuals whose jobs require such access.

Please contact me at the telephone number listed above or via e-mail at [regulatory@pioneertelephone.com](mailto:regulatory@pioneertelephone.com) if you have any additional questions or concerns. Thank you.

Sincerely,

*Handwritten signature*

**Kevin Photiades**  
Regulatory Manager

14-00000  
14-00000

**47 CFR § 64.2009(e) COMPLIANCE CERTIFICATION**

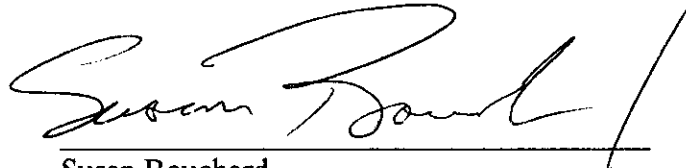
**Telecom Management, Inc. d/b/a Pioneer Telephone**

**RECEIVED & INSPECTED**

**FEB 6 2006**

**FCC - MAILROOM**


I, Susan Bouchard, President of Telecom Management, Inc. d/b/a Pioneer Telephone (Company), hereby certify that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the rules contained in Subpart U, 47 CFR §64.2001 – 2009 relating to customer proprietary network information.



Susan Bouchard

Subscribed to and sworn before me this 2<sup>nd</sup> day of February, 2006.

KEVIN PHOTIADES  
Notary Public, Maine  
My Commission Expires October 3, 2009

  
Notary Public in and for the State of Maine